

SEP 25 2024

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

PER  DEPUTY CLERK

UNITED STATES OF AMERICA : No. 1:24-CR- ~~258~~
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 : (JUDGE Conner)
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 :
 [1] PARTHKUMAR VINODBHAI PARMAR, :
 [2] JAYDEEP DESAI, :
 [3] RONAK JASHBAI PATEL, :
 [4] JAYKUMAR HETALKUMAR PATEL, :
 [5] RAKESHKUMAR PATEL, and :
 [6] SHIVAM JATIN PATEL, :
 Defendants. :

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

At times material to this Indictment:

1. Defendant Parthkumar Vinodbhai Parmar (a/k/a “Parth,” “Parth Borsad,” and “Alien”) worked at a call center in India.
2. Defendant Jaydeep Desai (a/k/a “JD” and “Jaydeep Gamanpara”) worked at a call center in India.
3. Defendant Ronak Jashbai Patel resided in New York.
4. Defendant Jaykumar Hetalkumar Patel resided in South Carolina.

5. Rakeshkumar Patel resided in Alabama.
6. Shivam Jatin Patel resided in Alabama.
7. Unindicted Coconspirator #1 resided within the Middle District of Pennsylvania.
8. Unindicted Coconspirator #2 resided within the Middle District of Pennsylvania.
9. United Parcel Service (“UPS”) was a package delivery company.
10. Federal Express Corporation (“FedEx”) was a package delivery company.

STATUTORY ALLEGATION

COUNT 1

18 U.S.C. § 1349

(Mail Fraud Conspiracy)

11. Beginning on an unknown date, but at least by on or about September 17, 2020, and continuing until on or about June 16, 2022, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**PARTHKUMAR VINODBHAI PARMAR,
JAYDEEP DESAI,
RONAK JASHBAI PATEL,
JAYKUMAR HETALKUMAR PATEL,
RAKESHKUMAR PATEL, and
SHIVAM JATIN PATEL,**

did knowingly and intentionally combine, conspire, confederate, and agree with one another and with Unindicted Coconspirator #1, Unindicted Coconspirator #2, and with others known and unknown to the grand jury, to devise a scheme and artifice to defraud individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for purposes of executing and attempting to execute the scheme and artifice to defraud individuals, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, knowingly took and received from an authorized depository for mail any matter and thing in violation of Title 18, United States Code, Section 1341.

The Objective of the Conspiracy

12. The object of the conspiracy was for the defendants and their coconspirators to unjustly enrich themselves and others by fraudulently inducing U.S.-based victims to send money to the defendants and their coconspirators using the mail and private carriers such as UPS and FedEx.

Manner and Means of the Conspiracy

13. It was part of the conspiracy that the defendants and their coconspirators engaged in a scheme to defraud and obtain money from U.S.-based victims through a variety of telephone scams, to have the victims send the money to other conspirators via UPS and FedEx, and then to cause the money to be transferred to other coconspirators.

14. The manner and means by which the conspiracy was sought to be accomplished included, among others, the following:

Telephone Scams

15. Members of the conspiracy operating from call centers in India and elsewhere contacted victims throughout the United States over the phone, via the internet, and through the mail. The victims included elderly and vulnerable individuals. After contacting victims, members of the conspiracy made false and fraudulent representations to threaten, coerce, and cause the victims to send packages containing cash addressed to specific recipients and to specific addresses in the United States via UPS and FedEx.

16. The defendants and their coconspirators utilized various types of scams to defraud victims, including impersonation of law

enforcement and/or government officials, technical support claiming victims' computers and/or financial accounts were compromised, retail refund, and identity theft scams.

17. For example, during some of the telephone calls, members of the conspiracy falsely stated that they worked for the Internal Revenue Service, the Drug Enforcement Administration, the Federal Trade Commission, the Social Security Administration, or other federal regulatory or investigative agencies. In some instances, the callers utilized the identities of legitimate government employees whose names could be found on the government agency's public website. The callers impersonating government or law enforcement officials falsely told victims that their Social Security numbers or personal information had been used in connection with a crime, or that their financial accounts were compromised and that the money within those accounts needed to be withdrawn and shipped to government officials for safekeeping until the issue was investigated and resolved. The callers further defrauded victims into believing they would be arrested and fined if they did not immediately cooperate with the investigation and move their compromised financial assets as directed.

18. Callers who impersonated government or law enforcement officials frequently convinced victims that they could not communicate with any other individuals, to include family members and friends, about the investigation as it would jeopardize the case. Furthermore, victims were often provided with a phony case number from the FTC, IRS, or other government agency, along with a fake case agent's name, and were threatened that they could not contact local law enforcement officials because it would endanger a federal investigation.

19. During other telephone calls, members of the conspiracy falsely represented that they worked for a retail business (such as Amazon) or a computer security company and falsely said that the victims' personal information had been compromised as part of a data leak or other emergency, and that the victims needed to send money immediately to resolve the emergency.

20. During other telephone calls, members of the conspiracy falsely represented that they worked for a bank or other financial institution and falsely said that the victims' accounts had been compromised and had been suspended, and that the victim had to pay money immediately to preserve or restore their accounts.

21. Whatever fraudulent story the callers used to defraud and threaten victims, the objective was the same: to deceive victims into believing they were required to send cash to resolve the phony investigation or other false emergency. The callers directed victims to withdraw cash from banking or investment accounts, package the money according to specific instructions, and send the packaged money to a fictitious recipient at a specific address in the United States via UPS or FedEx. The callers told victims that if they did not send the money, they would be arrested and charged with crimes, or otherwise suffer financial or other threatened injury.

Recruiters and Managers

22. Members of the conspiracy, including Parthkumar Vinodbhai Parmar and Jaydeep Desai, operated from a call center in India and recruited people in India and the United States to join and participate in the conspiracy. For example, Parthkumar Vinodbhai Parmar recruited Ronak Patel, Jaykumar Patel, Rakesh Patel, Shivam Patel, and Unindicted Coconspirator #1 to the conspiracy as “runners” whose job was to collect the packages containing the cash that call-scam victims had fraudulently been induced to send by UPS and FedEx.

23. After recruiting the runners into the conspiracy, Parthkumar Vinodbhai Parmar and Jaydeep Desai managed the runners' activities for the conspiracy. For example, Parthkumar Vinodbhai Parmar and Jaydeep Desai communicated with the runners by telephone and text message, including via messaging services such as WhatsApp, to educate them about the conspiracy and its objects, to provide them with instructions about how to collect packages that victims sent by UPS and FedEx, and to instruct runners about what to do with the money they obtained from the packages.

24. Parthkumar Vinodbhai Parmar and Jaydeep Desai, and other coconspirators known and unknown to the grand jury, caused the runners to be provided with fake identification documents that included the runners' photographs, and instructed the runners to use the fake identification documents to collect packages that victims sent to UPS and FedEx pickup locations addressed to fictitious named recipients.

25. Parthkumar Vinodbhai Parmar and Jaydeep Desai, and other coconspirators known and unknown to the Grand Jury, provided the runners with information needed to retrieve the packages from UPS and FedEx pickup locations, including package tracking numbers, the

senders' (*i.e.*, victims') names and addresses, the addresses of the UPS and FedEx pickup locations where the victims had been directed to send the packages, the anticipated amount of cash within the packages, and the fictitious names of the recipients on the packages that matched the fake identification documents the runners had been provided.

26. Parthkumar Vinodbhai Parmar and Jaydeep Desai provided the runners with specific instructions about what to do once they collected the packages containing the money the victims sent, including to create videos of themselves opening the packages and documenting their contents, and to tell the runners what to do with the money they obtained from the packages.

27. Parthkumar Vinodbhai Parmar and Jaydeep Desai arranged for other coconspirators to collect money from the runners, and thereafter to transfer the money to other coconspirators.

Runners

28. Parthkumar Vinodbhai Parmar, Jaydeep Desai, and other coconspirators recruited Ronak Patel, Jaykumar Patel, Rakeshkumar Patel, Shivam Patel, Unindicted Coconspirator #1, and Unindicted Coconspirator #2, to join the conspiracy as runners. After joining the

conspiracy, and knowing of its objectives, Ronak Patel, Jaykumar Patel, Rakeshkumar Patel, Shivam Patel, Unindicted Coconspirator #1, and Unindicted Coconspirator #2 agreed to and did collect scores of packages containing cash that victims sent via UPS and FedEx to locations throughout the United States.

29. The conspiracy relied on a broad network of runners and other coconspirators who lived in a variety of locations in the United States. As noted above, victims were directed to send packages containing cash and other items of value to numerous UPS and FedEx locations throughout the United States. Members of the conspiracy who acted as runners typically collected the packages from UPS and FedEx pickup locations within driving distance of the geographic area in which they lived.

30. For example, during his participation in the conspiracy, Ronak Patel lived in or around Long Island, New York. Between April and June 2021, after he had joined the conspiracy, Ronak Patel used fake identification documents provided by other coconspirators and picked up or attempted to pick up approximately 18 packages

containing approximately \$620,000 that victims sent to UPS or FedEx pickup locations in New York.

31. As further example, during his participation in the conspiracy, Jaykumar Patel lived in or around Spartanville, South Carolina. In July and August 2021, after he joined the conspiracy, Jaykumar Patel used fake identification documents provided by other coconspirators and picked up or attempted to pick up approximately seven packages containing approximately \$208,000 that victims sent to FedEx pickup locations within 20 miles of Jaykumar Patel's residence.

32. As further example, during his participation in the conspiracy, Rakeshkumar Patel lived in or around Dothan, Alabama. Between June and August 2021, after he joined the conspiracy, Rakeshkumar Patel used fake identification documents provided by other coconspirators and picked up or attempted to pick up approximately 17 packages containing approximately \$209,000 that victims sent to UPS or FedEx locations in Alabama.

33. As further example, during his participation in the conspiracy, Shivam Patel lived near Rakeshkumar Patel in the greater Dothan, Alabama area. Between March and August 2021, after joining

the conspiracy, Shivam Patel used fake identification documents provided by other coconspirators and picked up or attempted to pick up approximately 16 packages containing approximately \$276,000 that victims sent to UPS or FedEx locations in Alabama.

34. As further example, during his participation in the conspiracy, Unindicted Coconspirator #1 lived in the Middle District of Pennsylvania. After joining the conspiracy, between April and July 2021, Unindicted Coconspirator #1 used fake identification documents provided by other coconspirators and picked up or attempted to pick up approximately 40 packages containing approximately \$1,600,000 that victims sent to UPS or FedEx locations in New York, Pennsylvania, and Maryland.

35. As further example, during his participation in the conspiracy, Unindicted Coconspirator #2 lived in the Middle District of Pennsylvania. After joining the conspiracy, between September 2020 and June 2022, Unindicted Coconspirator #2 used fake identification documents provided by other coconspirators and picked up or attempted to pick up approximately 26 packages containing approximately

\$570,000 that victims sent to UPS or FedEx locations in Pennsylvania and Maryland.

36. Ronak Patel, Jaykumar Patel, Rakeshkumar Patel, Shivam Patel, Unindicted Coconspirator #1, and Unindicted Coconspirator #2 kept a percentage of the cash that they collected from the packages and provided the rest to other coconspirators in the United States and India.

37. In addition to collecting packages and providing the victims' money to other coconspirators, defendants Ronak Patel, Jaykumar Patel, Rakeshkumar Patel, Shivam Patel, Unindicted Coconspirator #1, and Unindicted Coconspirator #2 communicated with one another and other members of the conspiracy, including Parthkumar Vinodbhai Parmar and Jaydeep Desai, and provided other material assistance to one another and other members of the conspiracy.

38. For example, in or around April 2021, at Parthkumar Vinodbhai Parmar's direction, Unindicted Coconspirator #1 traveled from the Middle District of the Pennsylvania to Long Island, New York to meet with Ronak Patel, who trained Unindicted Coconspirator #1 about how to pick up packages from UPS and FedEx locations, including how to use the fake identification documents and how to

document the contents of the packages by creating videos while unboxing them. While in New York in April 2021, Ronak Patel and Unindicted Coconspirator #1 worked together on behalf of the conspiracy to pick up packages containing tens of thousands of dollars that victims had sent to UPS or FedEx pickup locations.

39. As further example, after the meeting between Ronak Patel and Unindicted Coconspirator #1 in April 2021, Parthkumar Vinodbhai Parmar, Ronak Patel, and Jaykumar Patel worked with one another and on behalf of the conspiracy to obtain fake identification documents for Unindicted Coconspirator #1, which Jaykumar Patel sent by UPS from South Carolina to Unindicted Coconspirator #1 in the Middle District of Pennsylvania in June 2021.

40. As further example, in the spring and summer of 2021, Rakeshkumar Patel and Shivam Patel worked together to pick up packages that victims had sent to UPS or FedEx locations, and to document the contents of the parcels that they collected.

Consolidators

41. After Ronak Patel, Jaykumar Patel, Rakeshkumar Patel, Shivam Patel, Unindicted Coconspirator #1, and Unindicted

Coconspirator #2 collected the packages containing cash from the UPS and FedEx locations, they kept a percentage of the money for themselves and aggregated the remaining cash to be distributed to other participants in the conspiracy known as consolidators.

42. Managers of the conspiracy, including Parthkumar Vinodbhai Parmar and Jaydeep Desai, directed the runners to deliver or transfer the collected cash to consolidators for further distribution to other members of the conspiracy.

All in violation of Title 18, United States Code, Section 1349.

THE GRAND JURY FURTHER CHARGES:

COUNTS 2 THROUGH 5

18 U.S.C. § 1341
(Mail Fraud)

43. Paragraphs 1 to 10 and 12 to 42 of this Indictment are incorporated here.

44. From on or about September 17, 2020, through on or about June 16, 2022, in the Middle District of Pennsylvania, and elsewhere, the defendants,

**PARTHKUMAR VINODBHAI PARMAR and
JAYDEEP DESAI,**

with the intent to defraud, devised, willfully participated in, with knowledge of its fraudulent nature the above-described scheme and artifice to defraud and obtain money and property by materially false and fraudulent pretenses, representations, and promises.

45. On or about the dates identified in the table below, in the Middle District of Pennsylvania, and elsewhere, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, the defendants,

**PARTHKUMAR VINODBHAI PARMAR and
JAYDEEP DESAI,**

aided and abetted by each other and others known and unknown to the Grand Jury, including Unindicted Coconspirator #1, knowingly caused to be delivered by a private and commercial interstate carrier the following matters, with each being a separate count:

Count	Mailed By/From	Mailed To	Tracking No.	Delivery Date	Contents
2	M.A., New York	3180 Carlisle Rd., Dover, PA 17315	280637773950 (FedEx)	6/19/2021	\$50,000
3	M.A., New York	2350 East Market St., York, PA 17402	280552227278 (FedEx)	6/19/2021	\$50,000
4	E.B., Texas	6436 Carlisle Pike, Mechanicsburg, PA 17050	281799716219 (FedEx)	7/24/2021	\$15,000
5	E.B., Texas	427 2 nd Street, Highspire, PA 17034	281811580536 (FedEx)	7/26/2021	\$10,000

All in violation of Title 18, United States Code, Sections 1341 and

2.

COUNTS 6 THROUGH 10

18 U.S.C. § 1341
(Mail Fraud)

46. Paragraphs 1 to 10 and 12 to 42 of this Indictment are incorporated here.

47. From on or about September 17, 2020, through on or about June 16, 2022, in the Middle District of Pennsylvania, and elsewhere, the defendant,

JAYDEEP DESAI,

with the intent to defraud, devised, willfully participated in, with knowledge of its fraudulent nature the above-described scheme and

artifice to defraud and obtain money and property by materially false and fraudulent pretenses, representations, and promises.

48. On or about the dates identified in the table below, in the Middle District of Pennsylvania, and elsewhere, for the purpose of executing and attempting to execute the above-described scheme and artifice to defraud, the defendant,

JAYDEEP DESAI,

aided and abetted by others known and unknown to the Grand Jury, including Unindicted Coconspirator #2, knowingly caused to be delivered by a private and commercial interstate carrier the following matters, with each being a separate count:

Count	Mailed By/From	Mailed To	Tracking No.	Delivery Date	Contents
6	G.W., Florida	2536 Eastern Blvd., York, PA 17402	1Z9X7W091520280016 (UPS)	9/17/2020	\$29,000
7	J.P., New Jersey	2350 East Market Street, York, PA 17402	396923261773 (FedEx)	9/18/2020	\$45,000
8	A.C., California	1000 Town Center Dr., York, PA 17408	781672616060 (FedEx)	12/21/2020	\$20,000
9	A.C., California	4702 Jonestown Rd., Harrisburg, PA 17109	781786905677 (FedEx)	12/22/2020	\$10,000
10	A.C., California	4300 North George Street Extension, Manchester, PA 17345	781865772890	12/24/2020	\$30,000

All in violation of Title 18, United States Code, Sections 1341 and

2.

COUNT 11
18 U.S.C. § 1956(h)
(Money Laundering Conspiracy)

49. Paragraphs 1 to 10, 12 to 44, 46 and 47 of this Indictment are incorporated here.

50. Beginning on an unknown date but at least by September 17, 2020, and continuing until at least June 16, 2022, in the Middle District of Pennsylvania and elsewhere, the defendants,

PARTHKUMAR VINODBHAI PARMAR,
JAYDEEP DESAI,
RONAK JASHBAI PATEL,
JAYKUMAR HETALKUMAR PATEL,
RAKESHKUMAR PATEL, and
SHIVAM JATIN PATEL,

knowingly combined, conspired, confederated and agreed with each other and with other persons, both known and unknown to the Grand Jury, to conduct and attempt to conduct financial transactions affecting interstate commerce, which involved the proceeds of a specified unlawful activity, that is, conspiracy to commit mail fraud, in violation of Title 18, United States Code, Section 1349, with the intent to promote the carrying on of an unlawful activity, that is, mail fraud, and while conducting and attempting to conduct such financial transactions, the defendants knew that the property involved in the financial

transactions represented the proceeds of some form of unlawful activity in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

All in violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATION

51. The allegations contained in paragraphs 1 through 50 of this Indictment are realleged and incorporated here for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c).

52. Upon conviction any of the offenses charged in Counts 1 through 10 of this Indictment, the defendants,

**PARTHKUMAR VINODBHAI PARMAR,
JAYDEEP DESAI,
RONAK JASHBAI PATEL,
JAYKUMAR HETALKUMAR PATEL,
RAKESHKUMAR PATEL, and
SHIVAM JATIN PATEL,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted.

53. Additionally, upon conviction of the offense alleged in Count 10 of this Indictment, the defendants,

**PARTHKUMAR VINODBHAI PARMAR,
JAYDEEP DESAI,
RONAK JASHBAI PATEL,
JAYKUMAR HETALKUMAR PATEL,
RAKESHKUMAR PATEL, and
SHIVAM JATIN PATEL,**

shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C); Title 18, United States Code, Section 982(a)(1); and Title 28, United States Code, Section 2461, all property, real or personal, involved in such offense, and all property traceable to such property.

54. If any of the property, real or personal, which constitutes or is derived from proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

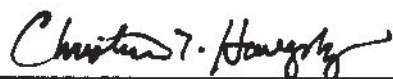
e. has been commingled with other property which cannot
be divided without difficulty,
the United States of America shall be entitled to forfeiture of substitute
property pursuant to Title 18, United States Code, Section 982(b), Title
21, United States Code, Section 853(p), as incorporated by Title 28,
United States Code, Section 2461(c).

A TRUE BILL

GERARD M. KARAM
United States Attorney



FOREPERSON


CHRISTIAN T. HAUGSBY
Assistant United States Attorney

9/25/2024
Date